

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of	)	
	)	
2018 Quadrennial Regulatory Review –	)	<b>MB Docket No. 18-349</b>
Review of the Commission’s Broadcast	)	
Ownership Rules and Other Rules Adopted	)	
Pursuant to Section 202 of the	)	
Telecommunications Act of 1996		

*Electronically filed through ECFS*  
To: The Commission

**REPLY COMMENTS OF TAXI PRODUCTIONS, INC.**

1. Taxi Productions, Inc. (“KJLH”) hereby replies to the Comments filed in this proceeding by the National Association of Black Owned Broadcasters, Inc. (“NABOB”) on April 29, 2019, and the *Ex Parte* report filed by the California Broadcasters Association (“CAB”), on March 4, 2019. KJLH supports NABOB’s position that the radio sub-cap ownership limits should not be relaxed and opposes CAB’s position in favor of eliminating the AM sub-cap limit.

2. The writer of these Reply Comments has been member of NABOB’s Board of Directors for many years and has participated in the efforts of that organization to advance and to increase African American ownership of broadcast stations. She is the General Manager of KJLH (FM), Compton, California, which has operated under African American ownership since 1965 and has been licensed to a subsidiary of Taxi Productions, Inc. for 40 continuous years, since 1979.

3. The challenges that African American broadcasters experience has been well documented in FCC proceedings and elsewhere. We fight for advertising dollars with both major market competitors within the market and, yes, with alternative audio delivery systems as well. We have consistently sought regulatory support for the survival and growth of African American media ownership.

4. More industry consolidation **will not help** small independent radio operators like KJLH. We are constantly playing the role of David, challenging the Goliath of well-funded mega-corporations that own a half dozen or more radio stations in our local market. Ownership limits go at least part way to prevent large companies from having such an overwhelming market share that they can price some of their advertising products below cost, leaving smaller operators unable to compete and survive, and they can pressure advertisers to deal exclusively with only them. No one has shown that adding a few more stations to a conglomerate mix will make the difference between survival and going out of business for companies constrained by today's caps, but independent broadcasters like KJLH know that adding those stations could break the backs of small station owners.

5. A relaxation of ownership caps will certainly not enhance the chances that more local voices will be heard. Lack of diversity and localism hurts the public. More growth by major market station groups appears to be a purely financial argument without consideration for the welfare of the community. Many local, independent, minority operators serve the local public much more effectively, day in and day out. Their survival is at least as important, and indeed is more so, than possibly enhancing the financial strength of large corporate operators.

6. One company's controlling more broadcast properties will not ensure that communities will benefit with more local coverage. It will not improve the employment options for local communities of color. On the contrary, more consolidation will likely adversely impact many of the goals expressed in the Communications Act of 1934.

7. No one is saying that every station owner should be limited to only one or two stations in a market. Owning more than one station can improve a licensee's economic prospects. But today's caps are far above one or two stations and should be sufficient to meet basic economies

of scale. Allowing one owner to have a couple of more outlets, so that it can squeeze independent owners more, will harm diversity of voices and locally based ownership of stations that are directly focused on the needs of the many local and diverse elements of the community.

8. That is why the existing radio ownership sub-caps should be preserved.<sup>1</sup>

Respectfully submitted,

  
Karen E. Slade

KJLH Radio  
161 N. LaBrea Ave.  
Inglewood, CA 90301  
Tel. 310-330-2200

May 29, 2019

CERTIFICATE OF SERVICE

I, Joan P. George, do hereby certify that I have, this 29<sup>th</sup> day of May, 2019, caused a copy of the foregoing "Reply Comments of Taxi Productions, Inc." to be sent by first class United States mail, postage prepaid, to the following:

James L. Winston, Esq.  
National Assn. of Black Owned Broadcasters  
1201 Connecticut Ave., N.W., Suite 200  
Washington, Dc 20036

Gregg P. Skall, Esq.  
Womble Bond Dickinson (US) LLP  
1200 - 19<sup>th</sup> St., N.W., Suite 500  
Washington, DC 20036  
Counsel for the California  
Broadcasters Association

Signed: 

---

<sup>1</sup> While it could be argued, as CAB does, that eliminating only the AM sub-caps would help AM broadcasters who suffer from a technology disadvantage, no showing has been made that any significant number of entities that want to acquire more AM stations today are unable to do so. Thus eliminating AM sub-caps may be a solution in search of a problem.